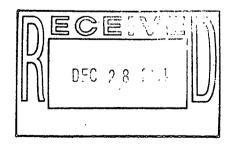
## Data Summary Report for IHSS Group 100-1

UBC 122 (Medical Facility) and IHSS 000-121 Tank T-1 (OPWL)

Approval received from the Colorado Department of Public Health and Environment December 13, 2004.

Approval letter contained in the Administrative Record.



December 2004

ADMIN RECORD

IA-A-002466



## TABLE OF CONTENTS

1.0	INTRODUCTION	
2.0	SITE CHARACTERIZATION	. ]
2.1	Historic Information and Data	. 4
	Accelerated Action Characterization Data	
2.3	Accelerated Action Exceedances	. 4
3.0	Sum of Ratios	12
4.0	Summary Statistics	12
5.0	RCRA UNIT CLOSURE	
6.0	SUBSURFACE SOIL RISK SCREEN	14
7.0	SUBSURFACE SOIL RISK SCREEN	14
8.0	NO FURTHER ACCELERATED ACTION SUMMARY	14
9.0	DATA QUALITY ASSESSMENT	15
9.1	Data Quality Assessment Process	1.
9.2	Verification and Validation of Results	16
9.	2.1 Accuracy         2.2 Precision	17
9.	2.2 Precision	2(
9.	2.3 Completeness	23
9.	2.4 Sensitivity	
9.3	Summary of Data Quality	24
	PROJECT CONCLUSIONS	
11.0	REFERENCES	24
	LIST OF FIGURES	•
Figure	e 1 IHSS Group 100-1 General Location Map	. 2
Figure	e 1 IHSS Group 100-1 General Location Mape 2 IHSS Group 100-1 Detailed Location Map	. :
Figure Figure	e 1 IHSS Group 100-1 General Location Map e 2 IHSS Group 100-1 Detailed Location Mape e 3 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plu	. Î
Figure Figure	e 1 IHSS Group 100-1 General Location Mape 2 IHSS Group 100-1 Detailed Location Map	. Î
Figure Figure	e 1 IHSS Group 100-1 General Location Map e 2 IHSS Group 100-1 Detailed Location Mape e 3 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plu	. Î
Figure Figure	e 1 IHSS Group 100-1 General Location Map e 2 IHSS Group 100-1 Detailed Location Mape e 3 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plu	. Î
Figure Figure	e 1 IHSS Group 100-1 General Location Mape 2 IHSS Group 100-1 Detailed Location Map	. Î
Figure Figure T	e 1 IHSS Group 100-1 General Location Map	. Î
Figure Figure T	e 1 IHSS Group 100-1 General Location Map	. Î
Figure Figure To Table	LIST OF TABLES  1 IHSS Group 100-1 General Location Map	3 11
Figure Figure To Table Sa Table	LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis	3 11 6
Figure Figure Table Sa Table	LIST OF TABLES  1 IHSS Group 100-1 General Location Map  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis ammary	3 11 6
Table Stable Table Table	LIST OF TABLES  1 IHSS Group 100-1 General Location Map  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis ummary  3 IHSS Group 100-1 Accelerated Action Characterization Data Greater Than	3 11 6
Table Stable Table Stable Table B	LIST OF TABLES  1 IHSS Group 100-1 General Location Map  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis aummary  3 IHSS Group 100-1 Accelerated Action Characterization Data Greater Than ackground Means Plus Two Standard Deviations	3 11 8
Table Sa Table St Table B Table Table	LIST OF TABLES  1 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plus Wo Standard Deviations  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis aummary  3 IHSS Group 100-1 Accelerated Action Characterization Data Greater Than ackground Means Plus Two Standard Deviations  4 RFCA Radionuclide Soil SORs	3 6 8 8
Table Sa Table Sa Table Table Table Table Table	LIST OF TABLES  1 IHSS Group 100-1 General Location Map  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis ammary	6 11 12 13
Table Sa Table Sa Table Ba Table Table Table Table Table	LIST OF TABLES  1 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plus Wo Standard Deviations  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis unmary  3 IHSS Group 100-1 Accelerated Action Characterization Data Greater Than ackground Means Plus Two Standard Deviations  4 RFCA Radionuclide Soil SORs  5 IHSS Group 100-1 Surface Soil Summary Statistics  6 IHSS Group 100-1 Subsurface Soil Summary Statistics	6 8 8 8 12
Table Sa Table Sa Table B Table Table Table Table Table	LIST OF TABLES  1 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plus wo Standard Deviations  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis aummary	3 8 8 8 8 8
Table Sa Table Bable Table Table Table Table Table Table Table	LIST OF TABLES  1 IHSS Group 100-1 Soil Sampling Results Greater than Background Means Plus Wo Standard Deviations  LIST OF TABLES  1 IHSS Group 100-1 Accelerated Action Characterization Specifications and ampling Deviations  2 IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis unmary  3 IHSS Group 100-1 Accelerated Action Characterization Data Greater Than ackground Means Plus Two Standard Deviations  4 RFCA Radionuclide Soil SORs  5 IHSS Group 100-1 Surface Soil Summary Statistics  6 IHSS Group 100-1 Subsurface Soil Summary Statistics	3 13 13 13 13 13 13

i

## Data Summary Report for IHSS Group 100-1

Table 10 Sample MS Evaluation Summary	19
Table 11 Sample MSD Evaluation Summary	21
Table 12 Field Duplicate Sample Frequency Summary	
Table 13 RPD Evaluation Summary	22
Table 14 V&V Summary	

## **ENCLOSURE**

Complete Data Set Compact Disc - Accelerated Action Data

#### **ACRONYMS**

AAESE Accelerated Action Ecological Screening Evaluation

ACM asbestos-containing material

AL action level

AR Administrative Record
ASD Analytical Services Division

bgs below ground surface
CAS Chemical Abstracts Service

CD compact disc

CDPHE Colorado Department of Public Health and Environment

CERCLA Comprehensive Environmental Response, Compensation, and Liability

Act

COC contaminant of concern

CRA Comprehensive Risk Assessment
DCGL derived concentration guidance levels

DOE U.S. Department of Energy
DQA Data Quality Assessment
DQO data quality objective

EPA U.S. Environmental Protection Agency

ER Environmental Restoration

ft foot

FY Fiscal Year

HPGe high-purity germanium
HRR Historical Release Report

IA Industrial Area

IASAP Industrial Area Sampling and Analysis Plan

IHSS Individual Hazardous Substance Site
IM/IRA Interim Measure/Interim Remedial Action

IMP Integrated Monitoring Plan
ISOCS In-Situ Counting System
K-H Kaiser-Hill Company, L.L.C.
LCS laboratory control sample
LLMW low-level mixed waste

μg/100 cm<sup>2</sup> micrograms per 100 square centimeters

μg/kg micrograms per kilogram (may be found as ug/kg)

mg/kg milligrams per kilogram

MS matrix spike

MSD matrix spike duplicate

NFAA No Further Accelerated Action
NLR No Longer Representative
NPWL New Process Waste Lines
OPWL Original Process Waste Lines

OU Operable Unit

PAC Potential Area of Concern

PARCCS precision, accuracy, representativeness, completeness, comparability, and

sensitivity

PCB polychlorinated biphenyl

pCi/g picocuries per gram

PCOC potential contaminant of concern

PDS Pre-Demolition Survey

QC quality control

RCRA Resource Conservation and Recovery Act

RFCA Rocky Flats Cleanup Agreement

RFETS or Rocky Flats Environmental Technology Site

Site

RFI/RI RCRA Facility Investigation/Remedial Investigation

RIN report identification number

RISS Remediation, Industrial Decommissioning and Demolition, and Site

Services

RL reporting limit

RPD relative percent difference SAP Sampling and Analysis Plan

SOR sum of ratios

SSRS Subsurface Soil Risk Screen SVOC semivolatile organic compound

SWD Soil Water Database

TSCA Toxic Substances Control Act
UBC Under Building Contamination
V&V verification and validation
VOC volatile organic compound
WRW wildlife refuge worker

### 1.0 INTRODUCTION

This Data Summary Report summarizes accelerated action characterization activities conducted at Individual Hazardous Substance Site (IHSS) Group 100-1, which consists of the Building 122 Under Building Contamination (UBC) site (referred to as UBC 122) and IHSS 000-121 Tank T-1 (Original Process Waste Lines [OPWL]) at the Rocky Flats Environmental Technology Site (RFETS or Site) in Golden, Colorado. Characterization activities were planned and executed in accordance with the Industrial Area (IA) Sampling and Analysis Plan (SAP) (IASAP) (DOE 2001) and IASAP Addendum #IA-04-04 (DOE 2003a). The IASAP Addendum was approved by the Colorado Department of Public Health and Environment (CDPHE) on November 20, 2003. Ecological effects will be evaluated in the Accelerated Action Ecological Screening Evaluation (AAESE) and the ecological risk assessment portion of the Sitewide Comprehensive Risk Assessment (CRA).

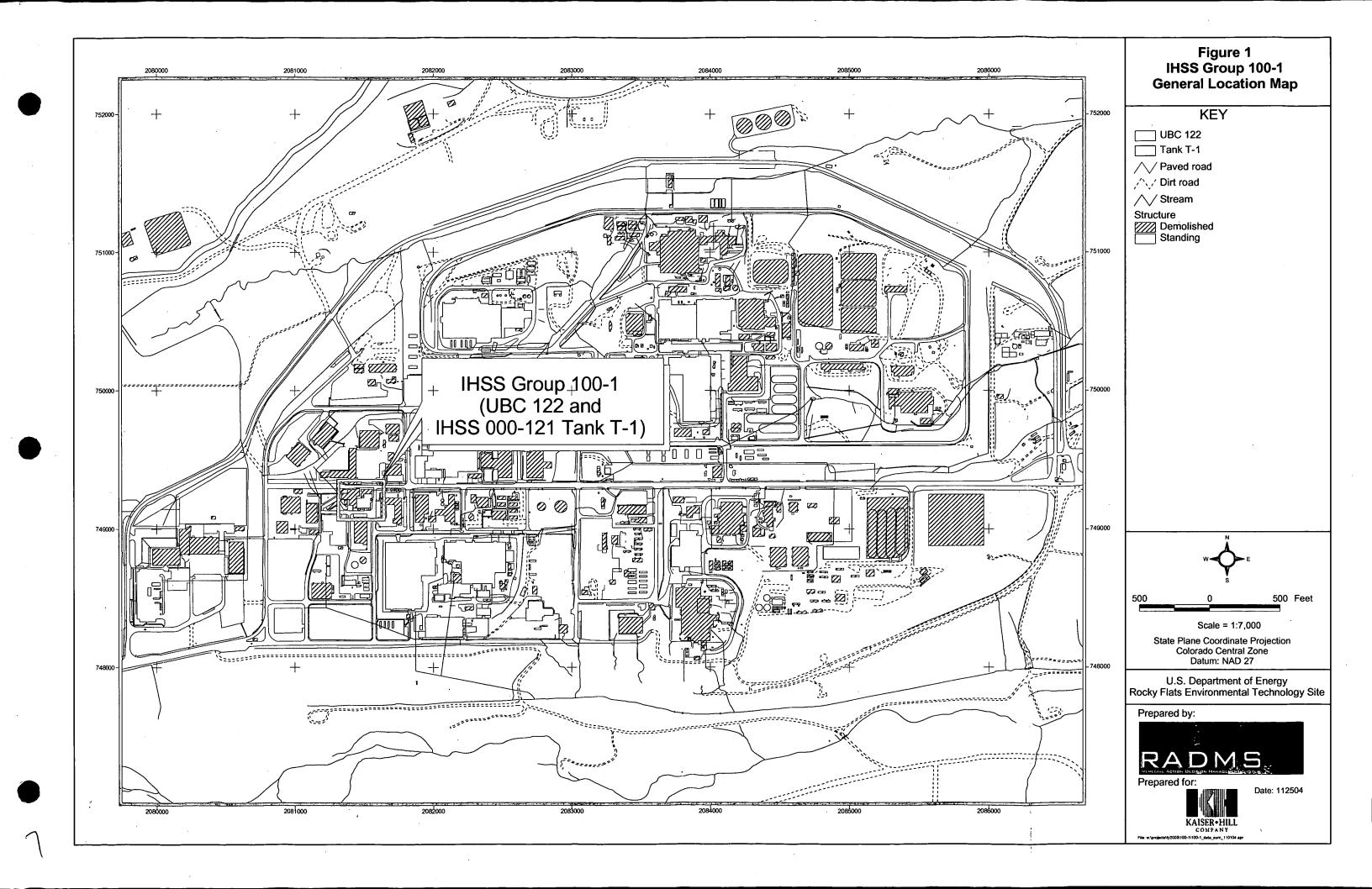
Approval of this Data Summary Report constitutes regulatory agency concurrence that IHSS Group 100-1 is a No Further Accelerated Action (NFAA) Site. This information and NFAA determination will be documented in the Fiscal Year (FY) 2005 (05) Historical Release Report (HRR).

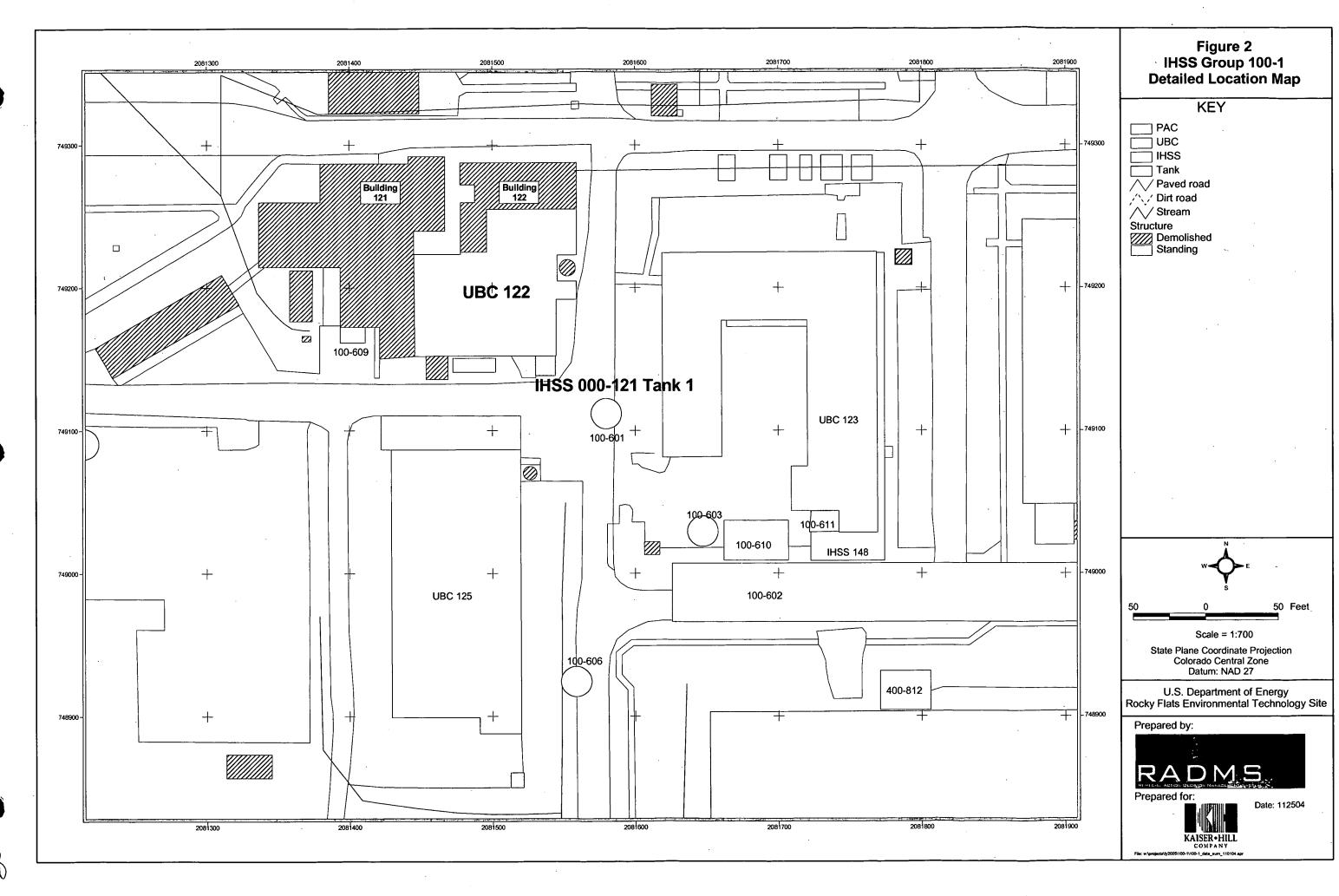
#### 2.0 SITE CHARACTERIZATION

IHSS Group 100-1 consists of UBC 122, which underlies the southern two-thirds of Building 122, and IHSS 000-121 Tank T-1, which was originally located just outside the southeastern corner of Building 122. The general location of IHSS Group 100-1 is shown on Figure 1, and a more detailed location is shown on Figure 2.

Adjacent to IHSS Group 100-1 lie two UBC Sites and two Potential Areas of Concern (PACs). IHSS Group 100-2, consisting of UBC 125 (Building 125 Standards Laboratory), lies approximately 65 feet (ft) south of IHSS Group 100-1. This IHSS was granted NFAA status in 2002 (CDPHE 2002a). UBC 123 (Building 123 Health Physics Laboratory), a member of IHSS Group 100-4, is approximately 60 ft east of IHSS Group 100-1. PAC 100-609 (Building 121 Security Incinerator), the only constituent of IHSS Group 100-5, is approximately 34 ft west of IHSS Group 100-1, just south of Building 121. UBC 123 and PAC 100-609 were granted NFAA status by CDPHE on April 22, 2003 (CDPHE 2003a, DOE 2003b). PAC 100-601 (Building 123 Phosphöric Acid Spill) is approximately 33 ft southeast of the southeastern corner of Tank T-1 and was granted NFAA status in 2002 (CDPHE 2002b). PAC 100-601 is not associated with an IHSS Group. All four of these areas are shown on Figure 2.

IHSS Group 100-1 characterization information consists of historical knowledge, previously collected analytical data, and accelerated action analytical data. Existing information and data for UBC 122 and IHSS 000-121 Tank T-1 are available in Appendix C of the IASAP (DOE 2001), the IA Data Summary Report (DOE 2000), the HRRs (DOE 1992-2003), and IASAP Addendum #IA-04-04 (DOE 2003a).





Accelerated action characterization data for IHSS Group 100-1 are summarized in Section 2.2. A compact disc (CD) is enclosed, which contains the real and quality control (QC) accelerated action data for this project. The CD contains a data set in which analyte names, Chemical Abstracts Service (CAS) numbers, and units are standardized, and derived analytes are provided.

#### 2.1 Historic Information and Data

The following summary is taken from IASAP Addendum #IA-04-04 (DOE 2003a).

Building 122 housed (until September 2004) the on-site medical facilities of the Plant and the occupational health and internal dosimetry organizations. Emergency medical services, diagnosis, decontamination, first aid, x-ray, minor surgical treatment, and ambulatory activities were carried out in this building. The building also contained clinical facilities to support routine employee and subcontractor physical examinations. Body counting, to measure radioactive material in the body, was also conducted. The facility contained three general areas: administration, internal dosimetry, and medical/health.

Building 122 was placed into service in 1953. Major additions were made in approximately 1967, 1969, and 1989. Other smaller additions and internal modifications were also made during the building's service life.

Very few chemicals were used in Building 122, and only small volumes of chemical wastes were generated. Chemicals used in Building 122 were principally related to development of x-ray film (for example, fixers and developers) and decontamination of workers (for example., water, Clorox, soap, and hydrogen peroxide). Fixers and developers consisted of inorganic chemicals, with silver being the long-term contaminant of concern (COC). Most of the film development work and related chemical storage occurred in Room 109. Starting in the mid-1980s, spent fixers were stored in a satellite accumulation area in Room 109. Developers and associated water were discharged into the sanitary sewer system. Decontamination fluids originally drained to Tank T-1. After the tank was removed, the building was connected to the New Process Waste Line (NPWL) system. No records were found indicating x-ray chemicals or decontamination fluids either spilled or leaked within the building.

The HRR discusses research studies related to beryllium, plutonium, americium, and uranium (DOE 1992-2003). No records have been found indicating the exact location of these studies within Building 122, nor is there indication that spills or releases to the environment occurred.

A radiological and chemical characterization was conducted as part of a Pre-Demolition Survey (PDS) (DOE 2004a) to define the nature and extent of radioactive and chemical contamination prior to demolition of Building 122. The COCs for the chemical characterization were asbestos, beryllium, volatile organic compounds (VOCs), metals, and polychlorinated biphenyls (PCBs). Radiological sampling results indicated a number of painted surfaces with elevated activities above the transuranic derived concentration guidance levels (DCGLs). All areas containing elevated activity were decontaminated (physically removed) prior to demolition. All areas with survey results less than DCGLs

were left in place for demolition. Friable asbestos-containing material (ACM) was abated prior to demolition.

Numerous beryllium smear samples were collected on the interior and exterior surfaces of the building. All smear sample results for Building 122 were less than the investigative limit of 0.1 microgram per 100 square centimeters (µg/100 cm²). Building 122 did not store or use significant quantities of materials containing VOCs or metals but did contain walls with lead shielding. The lead-lined walls were removed and managed as low-level mixed waste (LLMW). Based on historical and process knowledge, PCB sampling was not performed as part of the PDS. All paints were assumed to contain PCBs and all painted surfaces were managed as PCB bulk product waste. PCB ballasts were removed and managed as Toxic Substances Control Act (TSCA) waste.

Tank T-1 was an 800-gallon stainless-steel storage tank used to collect wastewater streams from Building 122, the Medical Facility. The Historical Site Assessment (DOE 2003c) states that the tank was located above ground. Other reports and available diagrams indicate it was located below ground (DOE 1992, 1994; Dow 1959). Waste drained from the building to the tank. When the tank was full, waste-was pumped out to a tank truck and then discharged to the OPWL system. The waste included trace radionuclides, bleach, soap, blood, and hydrogen peroxide. The Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit (OU) 9 reports that Tank T-1 was removed in January 1984 (DOE 1992). During demolition of Building 122, the area the tank formerly occupied was excavated, and the tank was not found.

#### 2.2 Accelerated Action Characterization Data

Accelerated action analytical data for IHSS Group 100-1 were collected in accordance with IASAP Addendum #IA-04-04 (DOE 2003a). Sampling specifications, including potential contaminants of concern (PCOCs) and media, are presented in Table 1. Deviations from the IASAP Addendum are also presented and explained in Table 1. Table 2 presents a summary of accelerated action sampling and analyses. The locations of samples and analytical results greater than background means plus two standard deviations or reporting limits (RLs), including Rocky Flats Cleanup Agreement (RFCA) (DOE et al. 2003) wildlife refuge worker (WRW) action level (AL) exceedances, are shown on Figure 3 and listed in Table 3. Figure 3 presents the analytical data for both surface soil and subsurface soil. WRW AL exceedances are shown in bold in Table 3 and in red on Figure 3.

#### 2.3 Accelerated Action Exceedances

A total of eight sampling locations were planned for IHSS Group 100-1. Data indicate that all contaminant activities and concentrations are less than RFCA WRW ALs except for arsenic. Arsenic was detected at sampling location BT39-007 (2.5 to 4.5 ft below ground surface [bgs]) at a concentration of 25 milligrams per kilogram (mg/kg), which is slightly greater than the WRW AL of 22.2 mg/kg. Arsenic was detected above background levels in subsurface soils at three other sampling locations (BT38-001-01,

Table 1
IHSS Group 100-1 Accelerated Action Characterization Specifications and Sampling Deviations

-IHSS/PAC/	Location	Proposed	Proposed	Actual Northing	Actual Easting	Actual Media	Actual Depth (ft)	Actual	Comments
IHSS 000-121	BT38-001-01	749139.535	Easting 2081531.718	749143.127	2081530.395	Surface Soil	0-0.5	Analyte Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	0.5-2.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	2.5-4.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	4.5-6.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	6.5-8.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	8.5-10.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.
IHSS 000-121	BT38-001-01	749139.535	2081531.718	749143.127	2081530.395	Subsurface Soil	10.5-12.5	Radionuclides, Metals	Biased. Location code renamed from BT38-001 to BT38-001-01 due to duplicate location code. Sampling location moved 3 ft northwest of proposed location due to abandoned water line. No other deviations from the planned specifications.

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IHSS/PAC/		Proposed	Proposed	Actual	Actual	Actual	Actual	Actual	
UBC Site	Location	Northing	Easting	Northing	Easting	Media.	Depth (ft)	Actual	Comments
UBC 122	BT38-006	749157.934	2081533.367	749157.826	2081532.863	Surface Soil	0-0.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT38-006	749157.934	2081533.367	749157.826	2081532.863	Subsurface Soil	0.5-2.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT38-006	749157.934	2081533.367	749157.826	2081532.863	Subsurface Soil	2.5-4.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT38-006	749157.934	2081533.367	749157.826	2081532.863	Subsurface Soil	4.5-6.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT39-007	749173.299	2081535.299	749170.191	2081534.020	Surface Soil	0-0.5	Radionuclides,	Biased. No deviations from the planned
UBC 122	BT39-007	749173.299	2081535.299	749170.191	2081534.020	Subsurface	0.5-2.5	Metals Radionuclides,	specifications.  Biased. No deviations from the planned
UBC 122	BT39-007	749173.299	2081535.299	749170.191	2081534.020	Soil Subsurface	2.5-4.5	Metals Radionuclides,	specifications.  Biased. No deviations from the planned
UBC 122	BT39-007	749173.299	2081535.299	749170.191	2081534.020	Soil_ Subsurface	4.5-6.5	Metals Radionuclides,	specifications.  Biased. No deviations from the planned
		, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	20010001277			Soil	1.5 0.5	Metals Radionuclides,	specifications.  Biased. Sampling location field-located 2 ft east
UBC 122	BT39-008	749164.965	2081531.653	749165.689	2081533.860	Surface Soil	0-0.5	Metals (Method 6010 required)	of planned location to target the actual location of the drain. No other deviations from the planned specifications.
UBC 122	BT39-008	749164.965	2081531.653	749165.689	2081533.860	Subsurface Soil	0.5-2.5	Radionuclides, Metals (Method 6010 required)	Biased. Sampling location field-located 2 ft east of planned location to target the actual location of the drain. No other deviations from the planned specifications.
ŲBC 122	BT39-008	749164.965	2081531.653	749165.689	2081533.860	Subsurface Soil	2.5-4.5	Radionuclides, Metals (Method 6010 required)	Biased. Sampling location field-located 2 ft east of planned location to target the actual location of the drain. No other deviations from the planned specifications.
UBC 122	BT39-008	749164.965	2081531.653	749165.689	2081533.860	Subsurface Soil	4.5-6.5	Radionuclides, Metals (Method 6010 required)	Biased. Sampling location field-located 2 ft east of planned location to target the actual location of the drain. No other deviations from the planned specifications.
UBC 122	BT39-009	749193.090	2081450.294	749193.103	2081450.255	Surface Soil	0-0.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT39-009	749193.090	2081450.294	749193.103	2081450.255	Subsurface Soil	0.5-2.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT39-009	749193.090	2081450.294	749193.103	2081450.255	Subsurface Soil	2.5-4.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT39-009	749193.090	2081450.294	749193.103	2081450.255	Subsurface Soil	4.5-6.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BT39-010	749220.564	2081512.534	749217.462	2081512.529	Surface Soil	0-0.5	Radionuclides, Metals	Biased. Sampling location field-located 3 ft south of planned location to target a crack in the floor. No other deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Surface Soil	0-0.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.



IHSS/PAC/ UBC Site	Location	Proposed Northing	Proposed Easting	Actual Northing	Actual Easting	Actual Media	Actual Depth (ft)	Actual Analyte	Comments
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Subsurface Soil	0.5-2.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Subsurface Soil	2.5-4.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Subsurface Soil	4.5-6.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Subsurface Soil	6.5-8.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Subsurface Soil	8.5-10.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
IHSS 000-121	BU38-018	749150.733	2081542.916	749150.770	2081542.910	Sübsurface Soil	10.5-12.5	Radionuclides, Metals	Biased. No deviations from the planned specifications.
UBC 122	BU39-003-01	749198.559	2081539.617	749198.582	2081539.614	Surface Soil	0-0.5	Radionuclides, Metals	Biased. Location code renamed from BU39-001 to BU39-003-01 due to duplicate location code. No deviations from the planned specifications.

Table 2
IHSS Group 100-1 Accelerated Action Characterization Sampling and Analysis Summary

Criteria	Planned Total	Actual Total
Number of Sampling Locations	8	8
Number of Samples	32	31
Number of Radionuclide Analyses	32	31
Number of Metal Analyses	32	31.

Table 3
IHSS Group 100-1 Accelerated Action Characterization Data Greater Than Background Means Plus Two Standard Deviations

IHSS/PAC/ UBC Site	Location Code	Northing	Easting	Start Depth (ft)	End Depth (ft)	Analyte	Result	WRW AL	Background Mean Plus Two Standard Deviations	Unit
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0	0.5	Antimony	0.630	409.0	0.470	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0	0.5	Chromium	18.000	268.0	16.990	mg/kg

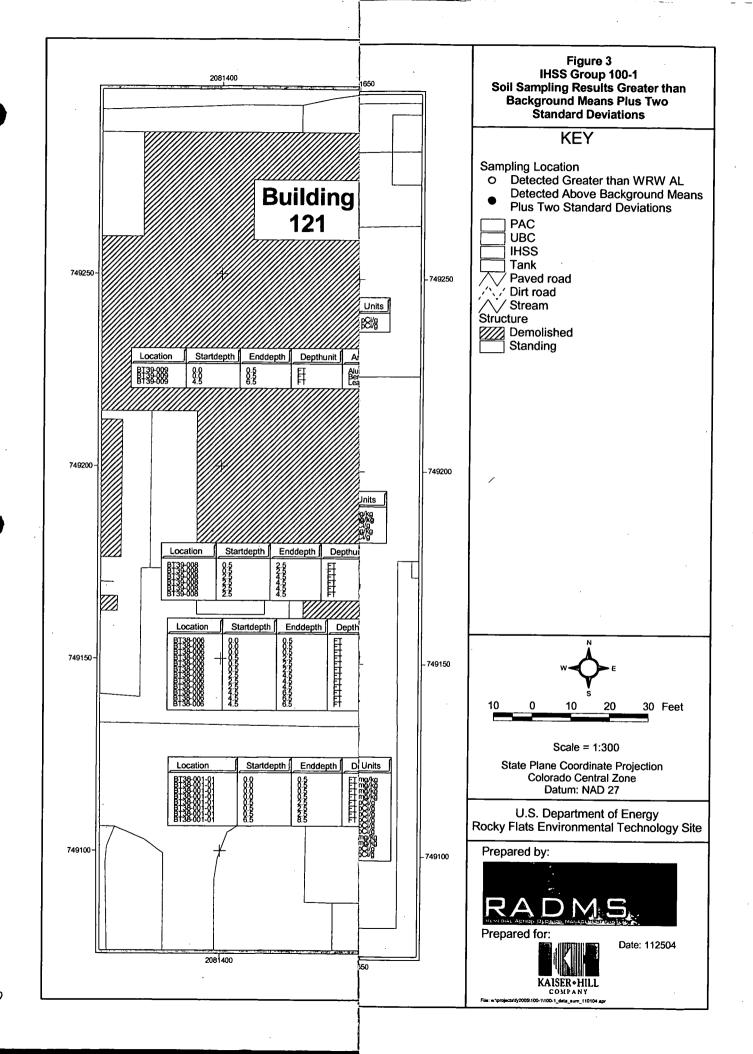
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IHSS/PAC/ UBC Site	Eocation Code	Northing	Easting	' Start Depth (ft)	End Depth (ft)	. Analyte	Result	WRW AL	Background Mean Plus Two Standard Deviations	Unit
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0	0.5	Copper	21.000	40900.0	18.060	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0	0.5	Zinc -	80.000	307000.0	73.760	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0.5	2.5	Aluminum	50000.000	228000.0	35373.170	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0.5	.2.5	Arsenic	20.000	22.2	13.140	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	0.5	2.5	Vanadium	94.000	7150.0	88.490	mg/kg
IHSS 000-121	BT38-001-01	749143.127	2081530.395	6.5	8.5	Uranium-235	0.185	8.0	0.120	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0.	0.5	Aluminum	17000.000	228000.0	16902.000	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	0	0.5	Antimony	0.640	409.0	0.470	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	0 .	0.5	Lithium	12.000	20400.0	11.550	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	0	0.5	Nickel	15.000	20400.0	14.910	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	0	. 0.5	Uranium-234	3.280	300.0	2.253	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0	0.5	Uranium-235	0.235	8.0	0.094	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0	0.5	Uranium-238	3.280	351.0	2.000	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0.5	2.5	Uranium-234	3.823	300.0	2.640	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0.5	2.5	Uranium-235	0.171	. 8.0	0.120	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	0.5	2.5	Uranium-238	3.823	351.0	1.490	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	4.5	6.5	Aluminum	42000.000	228000.0	35373.170	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	4.5	6.5	Arsenic	14.000	22.2	13.140	mg/kg
IHSS 000-121	BU38-018	749150.770	2081542.910	6.5	8.5	Uranium-235	0.135	8.0	0.120	pCi/g
IHSS 000-121	BU38-018	749150.770	2081542.910	6.5	8.5	Uranium-238	1.576	351.0	1.490	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0	0.5	Uranium-234	. <i>3.488</i>	300.0	2.253	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0	0.5	Uranium-235	0.198	8.0	0.094	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0	0.5	Uranium-238	3.488	351.0	2.000	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0.5	2.5	Uranium-234	4.277	300.0	2.640	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0.5	2.5	Uranium-235	0.228	'8.0	0.120	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	0.5	2.5.	Uranium-238	4.277	351.0	1.490	pCi/g
UBC 122	BT38-006	749157.826	Ź081532.863	2.5	4.5	Uranium-234	3.986	300.0	2.640	pCi/g
UBC 122	BT38-006	749157.826	2081532.863	2.5	4.5	Uranium-235	0.179	8.0	0.120	pCi/g

## Data Summary Report for IHSS Group 100-1

	5		Ls.	cluding RFCA WRW A	ns or RLS, in	ard deviation	ns plus two stand	ackground mea	sults greater than b	Bold font denotes res
g\iDq	2.000	351.0	2.060	8£S-muins1U	<b>č</b> .0	0	2081539.614	749198.582	BΩ36-003-01	NBC 155
g\iDq	<del>1</del> 60.0	0.8	861.0	SES-muins1U	<b>č</b> .0	0	2081539.614	749198.582	B∩39-003-01	UBC 122
g\i⊃q	<b>7</b> 60.0	0.8	0.152	₹£2-muinæ1U	٥.0	0	2081512.529	294.712647	BT39-010	NBC 155
m€\kg	14.910	20400.0	16.000	Nickel	<b>č</b> .0	0	2081512.529	749217,462	BT39-010	UBC 122
mg/kg	055.11	0.00402	12.000	Lithium	<b>č</b> .0	0	2081512.529	749217.462	BT39-010	UBC 122
mg/kg	16.990	0.892	17.000	Сһютіит	<b>c</b> .0	0	2081512.529	Z94.712647	BT39-010	UBC 122
mg/kg	996'0	0.126	1.000	Beryllium	٥.0	0	2081512.529	294.712647	BT39-010	NBC 155
ш&ук	16902.000	0.000822	18000.000	munimulA	٥.0	0 .	2081512.529	749217.462	BT39-010	NBC 155
ш\$\к\$	24.970	0.0001	26.000	Lead	۶ <sup>.</sup> 9	S.4	2081450.255	£01.591947	BT39-009	NBC 155
тв/кв	996'0	0.126	001.1	Beryllium	<b>č.</b> 0	0	2081450.255	£01.591947	BT39-009	UBC 122
теле	16902.000	0.000822	000.00061	munimulA	<b>č</b> .0	0	2081450.255	£01.591947	BT39-009	UBC 122
g\i⊃q	1,490	321.0	2.054	∕ 8£S-muinsıU	S.4	2.5	2081533.860	689.291647	BL33-008	UBC 122
g\i⊃q	0.120	0.8	0.142	Z£S-muins1U	5.4	2.5	2081533.860	689.231647	BL39-008.	UBC 122
ту/к	13.140	22.2	16.000	oinszıA	S.4	2.5	2081533.860	689.231647	BT39-008	NBC 155
mg/kg	35373.170	0.000822	37000.000	munimulA	S.4	2.5	2081533.860	689. <b>2</b> 91647	BL39-008	NBC 155
g\iDq	1,490	321.0	164.1	8£S-muinæ1U	2.5	<b>c.</b> 0	2081533.860	689.291647	BT39-008	NBC 155
g\iDq	0.120	0.8	£71.0	CES-muins1U	2.5	<b>č</b> .0	2081533.860	689.291647	BT39-008	OBC 133
8/iDq	0.020	0.02	260.0	Plutonium-239/240	2.0	S.4.	2081534.020	161'0L16¢L	BT39-007	UBC 122
w€\k8	064.88	0.0217	000.89	muibansV	S.4	2.5	2081534.020	161.071647	BT39-007	NBC 155
g/iDq	0.120	0.8	0.250	₹£2-muinæ1U	S.4	2.5	2081534.020	161.071947	BT39-007	NBC 155
gy/gm	13.140	2.22	25.000	Arsenic	5.4	2.5	2081534.020	161.071647	BL39-007	OBC 155
mg/kg	33373.170	0.000822	4000.000	munimulA	S.4	2.5	2081534.020	161.071947	BL39-007	UBC 122
g\iDq	1.490	321.0	3.484	8£S-muinsıU	ç.ð .	2.4	2081532,863	928.721947	BT38-006	NBC 155
g\i⊃q	0.120	0.8	651.0	₹£2-muinகīU	£.8	5.4	2081532.863	928.721947	BT38-006	NBC 155
8/i)d	7.640	0.00£	. +8+.8	4£2-muinarU	5.0	5.4	2081532.863	928.721947	BT38-006	UBC 122
gVi/g	06 <del>1</del> ,1	321.0	386.£	8£S-muinæiU	S.4	2.5	2081532.863	928.721947	BT38-006	UBC 122
: JinU	Background: Mean Rlus Two Standard Deviations:	MEW.	ηnsəχ	s)ylanA	(tt) Debth End	Start Depth (ft)	ganseJ	Northing	Location	ABC-SIFE IHZS/LVC/

Italic font denotes



BU38-018, and BT39-008), but was below the WRW AL. Subsurface soil results are evaluated as part of the Subsurface Soil Risk Screen (SSRS) in Section 6.0.

#### 3.0 SUM OF RATIOS

RFCA Radionuclide sums of ratios (SORs) were calculated for IHSS Group 100-1 sampling locations based on the accelerated action analytical data for the COCs and the WRW ALs. Radionuclide SORs were calculated for all locations with analytical results greater than background means plus two standard deviations for americium-241, plutonium-239/240, uranium-234, uranium-235, and uranium-238. Plutonium-239/240 activities are derived from americium-241 activities (that is, plutonium-239/240 activity = americium-241 gamma spectroscopy activity x 5.7) where high-purity germanium (HPGe) detection was used for analysis. Table 4 presents the SORs for surface and subsurface soil (0 to 3 ft). All SORs for radionuclides in soil are less than 1:

Table 4
RFCA Radionuclide Soil SORs

Location	Starting Depth (ft)	Ending: Depth (ft)	SOR
BT38-006	0	0.5	0.05
BT38-006	0.5	2.5	0.05
BT38-006	2.5	4.5	0.05
BT39-007	2.5	4.5	0.03
BT39-008	0.5	2.5	0.03
BT39-008	2.5	4.5	0.02
BT39-010	0,	0.5	0.02
BU38-018	0	0.5	0.05
BU38-018	0.5	2.5	0.05
BU39-003-01	0	0.5	0.03

Nonradionuclide SORs are calculated for locations with analytical results greater than 10 percent of the WRW ALs. Surface soil SORs for nonradionuclide COCs were not calculated for IHSS Group 100-1 because there were no results greater than 10 percent of the WRW ALs. Subsurface soil SORs for nonradionuclides were not calculated because subsurface soil concentrations are evaluated as part of the SSRS in Section 6.0.

#### 4.0 SUMMARY STATISTICS

Summary statistics, by analyte, were calculated for the IHSS Group 100-1 sampling locations, as presented in Tables 5 and 6.

Table 5
IHSS Group 100-1 Surface Soil Summary Statistics

Analyte	Number of Samples Analyzed	Detection Frequency (Greater Than Background)	Average Concentration	Maximum Concentration	Background Mean Plus Two Standard Deviations	WRW AL	Unit
Aluminum	8	37.50%	18000.00	19000.00	16902.00	228000	mg/kg
Antimony	8.	25.00%	0.64	0.64	0.47	409	mg/kg
Beryllium	8	25.00%	1.05	1.10	0.97	921	mg/kg
Chromium	8	25.00%	17.50	18.00	16.99	268	mg/kg
Copper	8	12.50%	21.00	21.00	18.06	40900	mg/kg
Lithium	8	25.00%	12.00	12.00	11.55	20400	mg/kg
Nickel	8	25.00%	15.50	16.00	14.91	20400	mg/kg
Uranium-234	8	25.00%	3.38	3.49	2.25	300	pCi/g
Uranium-235	8	50.00%	0.20	0.24	0.09	8	pCi/g
Uranium-238	8	37.50%	2.94 -	3.49	2.00	351	pCi/g
Zinc	8	12.50%	80.00	80.00	73.76	307000	mg/kg

Table 6
IHSS Group 100-1 Subsurface Soil Summary Statistics

Analyte	Number of Samples Analyzed	Detection Frequency (Greater Than Background)	Average Concentration	Maximum Concentration	Background Mean Plus Two Standard Deviations	WRW AL	Unit
Aluminum '	23	17.39%	42250.00	50000.00	35373.17	228000	mg/kg
Arsenic	23	, 17.39%	18.75	25.00	13.14	22.2	mg/kg
Lead	23	4.35%	26.00	26.00	24.97	1000	mg/kg
Plutonium-239/240	23	4.35%	0.09	0.09	0.02	50	pCi/g
Uranium-234	23	17.39%	3.89	4.28	2.64	300	pCi/g
Uranium-235	23	39.13%	0.18	0.25	0.12	8	pCi/g
Uranium-238	23	30.43%	3.00	4.28	1.49	351	pCi/g
Vanadium	. 23	8.70%	94.50	95.00	88.49	7150	mg/kg

## 5.0 RCRA UNIT CLOSURE

NPWL were connected to Building 122. This RCRA Unit is part of IHSS Group 000-4 and is being closed under a Closure Decision Document (DOE 2004b). After building demolition, the NPWL were removed from this area. Specific information regarding this removal will be included in the RCRA closure documentation and the IHSS Group 000-4 Closeout Report.

#### 6.0 SUBSURFACE SOIL RISK SCREEN

The SSRS follows the steps identified on Figure 3 of Attachment 5 of the RFCA Modification (DOE et al. 2003).

#### Screen 1 – Are the COC concentrations below RFCA Table 3 WRW soil ALs?

No. All subsurface COC concentrations are less than the WRW ALs, except for the subsurface soil arsenic concentration of 25 mg/kg at sampling location BT39-007 (2.5 to 4.5 ft bgs), which is only slightly higher than the WRW AL of 22.2 mg/kg.

## Screen 2 – Is there a potential for subsurface soil to become surface soil (landslide and erosion areas identified on Figure 1)?

No. Based on Figure 1 of RFCA Attachment 5 (DOE et al. 2003), IHSS Group 100-1 is not located in an area considered prone to landslides or erosion.

## Screen 3 – Does subsurface soil radiological contamination exceed criteria in Section 5.3 and Attachment 14?

No. All radiological activities in IHSS Group 100-1 were below the criteria specified in Section 5.3 and Attachment 14.

# Screen 4 – Is there an environmental pathway and sufficient quantity of COCs that would cause an exceedance of the surface water standards?

No. Contaminant migration via erosion and groundwater are the two possible pathways whereby surface water could become contaminated by IHSS Group 100-1 COCs. Migration via erosion is unlikely because IHSS Group 100-1 is not located in an area prone to landslides or erosion.

Groundwater in this area flows east-northeast. Six groundwater monitoring wells are located to the east, surrounding UBC 123. These wells are part of the Integrated Monitoring Plan (IMP). Data from these wells show RFCA Tier I and Tier II AL exceedances of uranium-238 and tetrachloroethene; and Tier II exceedances of methylene chloride, thallium, molybdenum, cadmium, barium, and cesium-137. Arsenic was not detected above background concentrations in any of these wells. Data for these wells reflect groundwater conditions in this area of the IA. Groundwater quality at these locations may not be attributed to any single upgradient IHSS Group. Further groundwater evaluation will be part of the Groundwater Interim Measure/Interim Remedial Action (IM/IRA).

#### 7.0 NO LONGER REPRESENTATIVE SAMPLING LOCATIONS

Because no remediation activities occurred at IHSS Group 100-1, none of the accelerated action sampling locations are being designated as No Longer Representative (NLR).

#### 8.0 NO FURTHER ACCELERATED ACTION SUMMARY

Based on analytical results and the SSRS, action is not required, and an NFAA determination is justified for IHSS Group 100-1 based on the following:

- Concentrations of COCs were not detected above RFCA WRW ALs except for arsenic, which was only slightly higher than the associated WRW AL.
- Migration of contaminants to surface water through erosion is unlikely because the area is not prone to landslides or erosion.
- Migration of contaminants in groundwater will not likely impact surface water because of the low levels of soil contamination found in IHSS Group 100-1.
   Groundwater will be further evaluated in a future decision document.

Approval of this Data Summary Report constitutes regulatory agency concurrence that IHSS Group 100-1 is an NFAA Site. This information and the NFAA determination will be documented in the FY05 HRR. Ecological factors will be evaluated in the AAESE and the CRA.

## 9.0 DATA QUALITY ASSESSMENT

The data quality objectives (DQOs) for this project are described in the IASAP (DOE 2001). All DQOs for this project were achieved based on the following:

- Régulatory agency-approved sampling program design: IASAP Addendum #IA-04-04 (approval letter dated November 20, 2003 [CDPHE 2003b]);
- Samples collected in accordance with the IASAP (DOE 2001); and
- The Data Quality Assessment (DQA), conducted as documented in the following sections.

#### 9.1 Data Quality Assessment Process

The DQA process ensures that the type, quantity, and quality of environmental data used in decision making are defensible, and is based on the following guidance and requirements:

- U.S. Environmental Protection Agency (EPA), 1994a, Guidance for the Data Quality Objective Process, QA/G-4;
- EPA, 1998, Guidance for the Data Quality Assessment Process; Practical Methods for Data Analysis, QA/G-9; and
- U.S. Department of Energy (DOE), 1999, Quality Assurance, Order 414.1A.

Verification and validation (V&V) of the data are the primary components of the DQA process. The final data are compared with original project DQOs and evaluated with respect to project decisions; uncertainty within the decisions; and quality criteria required for the data, specifically precision, accuracy, representativeness, completeness, comparability, and sensitivity (PARCCS). Validation criteria are consistent with the following RFETS-specific documents and industry guidelines:

• EPA, 1994b, U.S. EPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, 540/R-94/012;

- EPA, 1994c, U.S. EPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, 540/R-94/013;
- Kaiser-Hill Company, L.L.C. (K-H) V&V Guidelines:
  - General Guidelines for Data Verification and Validation, DA-GR01-v2, 2002a
  - V&V Guidelines for Isotopic Determinations by Alpha Spectrometry, DA-RC01-v2, 2002b
  - V&V Guidelines for Volatile Organics, DA-SS01-v3, 2002c
  - V&V Guidelines for Semivolatile Organics, DA-SS02-v3, 2002d
  - V&V Guidelines for Metals, DA-SS05-v3, 2002e; and
- Lockheed-Martin, 1997, Evaluation of Radiochemical Data Usability, ES/ER/MS-5.

This report will be submitted to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Administrative Record (AR) for permanent storage 30 days after being provided to CDPHE and/or EPA.

#### 9.2 Verification and Validation of Results

Verification ensures that data produced and used by the project are documented and traceable in accordance with quality requirements. Validation consists of a technical review of all data that directly support the project decisions so that any limitations of the data relative to project goals are delineated and the associated data are qualified accordingly. The V&V process defines the criteria that constitute data quality, namely PARCCS parameters. Data traceability and archival are also addressed. V&V criteria include the following:

- Chain-of-custody;
- Preservation and hold times;
- Instrument calibrations;
- Preparation blanks;
- Interference check samples (metals);
- Matrix spikes/matrix spike duplicates (MS/MSDs);
- Laboratory control samples (LCSs);
- Field duplicate measurements;
- Chemical yield (radiochemistry);
- Required quantitation limits/minimum detectable activities (sensitivity of chemical and radiochemical measurements, respectively); and
- Sample analysis and preparation methods.

Evaluation of V&V criteria ensures that PARCCS parameters are satisfactory (that is, within tolerances acceptable to the project). Satisfactory V&V of laboratory quality controls are captured through application of validation "flags" or qualifiers to individual records.

Raw, hard-copy data (for example, individual analytical data packages) are currently filed by report identification number (RIN) and maintained by K-H Analytical Services Division (ASD); older hard copies may reside in the Federal Center in Lakewood, Colorado. Electronic data are stored in the RFETS Soil Water Database (SWD).

The data sets addressed in this report are included on the enclosed CD in Microsoft Access 2000 format.

## 9.2.1 Accuracy

The following measures of accuracy were evaluated:

- LCSs;
- Surrogates;
- Field blanks; and
- Sample MSs.

Results are compared to method requirements and project goals. The results of these comparisons are summarized for RFCA COCs where the result could impact project decisions. Particular attention is paid to those values near ALs when QC results could indicate unacceptable levels of uncertainty for decision-making purposes.

## Laboratory Control Sample Evaluation

The frequency of LCS measurements is presented in Table 7. As indicated, LCS analyses were run for all methods except gamma spectroscopy. When the In-Situ Counting System (ISOCS) technique is used for gamma spectroscopy, an internal standard approach is used instead of LSC. The onsite laboratory that performs gamma spectroscopy is therefore not required to provide LCS data.

Table 7
LCS Frequency Summary

Test Method	Lab Batch	LCS Run
Alpha Spec	4293485	Yes
Alpha Spec	4293486	Yes
Alpha Spec	4293487	Yes
Alpha Spec	4294440	Yes
Alpha Spec	4294441	Yes
Alpha Spec	4294443	Yes
SW-846 6010	4288658	Yes
SW-846 6010	4289424	Yes
SW-846 6010	4293557	Yes
SW-846 6010	4299180	Yes
SW-846 6010	4299181	Yes

LCS results are summarized in Table 8. The minimum and maximum LCS recoveries are tabulated by chemical for the entire project. LCS results that were outside of tolerances were reviewed to determine whether a potential bias might be indicated. LCS recoveries are not indicative of matrix effects because they are not prepared using Site samples. LCS results do indicate whether the laboratory may be introducing a bias in the results. Recoveries reported above the upper limit may indicate the actual sample results are less than reported. Because this is environmentally conservative, no further action is needed.

Table 8
LCS Evaluation Summary

April 100 Commission and the class of the	and the second s		·	
Test Method	CAS No.	Analyte	Minimum (%REC)	Maximum (%REC)
SW-846 6010	7429-90-5	Aluminum	94	99
SW-846 6010	7440-36-0	Antimony	92	· 92
SW-846 6010	7440-38-2	Arsenic	89	91
SW-846 6010	7440-39-3	Barium	94	97
SW-846 6010	7440-41-7	Beryllium	99	102
SW-846 6010	7440-43-9	Cadmium	91	94
SW-846 6010	7440-47-3	Chromium	94	96
SW-846 6010	7440-48-4	Cobalt	91	92
SW-846 6010	7440-50-8	Copper	93	95
SW-846 6010	7439-89-6	Iron	99	102
SW-846 6010	7439-92-1	Lead	93	94
SW-846 6010	7439-93-2	Lithium	97	97
SW-846 6010	7439-96-5	Manganese	95	99
SW-846 6010	7439-97-6	Mercury	91	97
SW-846 6010	7439-98-7	Molybdenum	93	94
SW-846 6010	7440-02-0	Nickel	93	94
SW-846 6010	7782-49-2	Selenium	89	92
SW-846 6010	7440-22-4	Silver	95	99
SW-846 6010	7440-24-6	Strontium	95	96
SW-846 6010	7440-31-5	Tin	91	93
SW-846 6010	11-09-6	Uranium, total	94	96
SW-846 6010	7440-62-2	Vanadium	94	95
SW-846 6010	7440-66-6	Zinc	89	97

The analytes with potentially unacceptable low recoveries were evaluated in the following manner. If the maximum sample result divided by the lowest LCS recovery for that analyte is less than the WRW AL, no further action is taken because any indicated bias is not great enough to affect project decisions. The one known WRW AL exceedance (arsenic in subsurface soil) was excluded from the evaluation. All LCS recoveries were within tolerance.

#### Surrogate Evaluation

VOCs and semivolatile organic compounds (SVOCs) are not COCs for IHSS Group 100-1; therefore, no surrogate recovery evaluation was conducted.

#### Field Blank Evaluation

Results of the field blank analyses are provided in Table 9. Detectable amounts of contaminants within the blanks, which could indicate possible cross-contamination of samples, are evaluated if the same contaminant is detected in the associated real samples. For detections (non-"U" laboratory qualifiers), evaluation consists of multiplying the field blank results by 10 (for laboratory contaminants) or 5 (for nonlaboratory contaminants) and comparing them to the WRW ALs. For this project, to be conservative, the factor used was 10 in all cases. When the corrected field blank result is less than the WRW AL, the associated real results are considered acceptable.

Table 9
Field Blank Summary

Laboratory	CAS No.	Analyte	Sample QC Code		Resulta- Unit
URS	15117-96-1	Uranium-235	FB	0.144	pCi/g
URS	7440-61-1	Uranium-238	FB	2.23	pCi/g

FB = field blank, RNS = equipment rinse

For the IHSS Group 100-1 data, none of the results from blank analyses exceeded the associated WRW AL when multiplied by 10. Therefore, blank contamination did not adversely impact project decisions. Any qualification of the data due to field blank results is also captured in the V&V flags, described in Section 9.2.3.

#### Sample Matrix Spike Evaluation

Table 10 provides a summary of the minimum and maximum MS results by chemical for the project. According to the EPA data validation guidelines (EPA 1994b), if organic MS recoveries are low, the data reviewer may use the MS and MSD results in conjunction with other QC criteria. For this project, no VOC or SVOC were analyzed, therefore evaluation for organics was not conducted.

Table 10
Sample MS Evaluation Summary

Test Method	CAS-No.	Analyte	Minimum (%REC)	Maximum, (%REC)	the second of the second second second second	Number of Laboratory Batches
SW-846 6010	7429-90-5	Aluminum	3270	8710	2	2
SW-846 6010	7440-36-0	Antimony	37.	42 ·	2	2
SW-846 6010	7440-38-2	Arsenic	87	89	2	2
SW-846 6010	7440-39-3	Barium	97	101	2	2



Test Method	CAS No.	Analyte	Minimum (%REC)	Maximum (%REC)	Number of MS Samples	Number of Laboratory Batches
SW-846 6010	7440-41-7	Beryllium	97	107	. 2	2
SW-846 6010	7440-43-9	Cadmium	84	90	.2	2
SW-846 6010	7440-47-3	Chromium	98	139	· 2	2
SW-846 6010	7440-48-4	Cobalt	88	92	2	2
SW-846 6010	7440-50-8	Copper	102	105	2	2
SW-846 6010	7439-89-6	Iron	0	5270	2	. 2
SW-846 6010	7439-92-1	Lead	93	106	2	2 ·
SW-846 6010	7439-93-2	Lithium	104	106	2	. 2
SW-846 6010	7439-96-5	Manganese	77	132	2	2
SW-846 6010	7439-97-6	Мегсигу	4.3	89	3 -	3
SW-846 6010	7439-98-7	Molybdenum	86	88	2	. 2
SW-846 6010	7440-02-0	Nickel	94	106	2	2
SW-846 6010	7782-49-2	Selenium	. 87	· 87	2	2
SW-846 6010	7440-22-4	Silver	91	93	· 2	. 2
SW-846 6010	7440-24-6	Strontium	91	103	2	2 .
SW-846 6010	7440-31-5	Tin	86	87	2	2
SW-846 6010	11-09-6	Uranium, Total	87	92	2	2
SW-846 6010	7440-62-2	Vanadium	91	134	2	2
SW-846 6010	7440-66-6	Zinc	107	113	2	2

For inorganics with MS recoveries greater than 0, the maximum sample results were divided by the lowest percent recovery for each analyte. If the resulting number was less than the WRW AL, decisions were not impacted. All inorganic results with MS recoveries greater than 0 were acceptable based on this criterion.

Percent recovery of iron ranged from 0 to 5,270. Because iron was not detected above background means plus two standard deviations, project decisions were not impacted by the MS percent recovery of 0 for iron.

#### 9.2.2 Precision

Precision is measured by evaluating both MSDs and field duplicates as described in the following sections.

## Matrix Spike Duplicate Evaluation

Laboratory precision is measured through the use of MSDs, as summarized in Table 11. Analytes with the highest relative percent differences (RPDs) (greater than 35 percent) are reviewed by comparing the highest sample result to the WRW AL. For analytes with RPDs exceeding 35 percent, if the highest sample results are sufficiently below the ALs, no further action is needed.

With respect to metals, aluminum, iron, manganese, mercury, and zinc had RPDs greater than 35 percent. Manganese and mercury were not detected above their respective background means plus two standard deviations. The maximum result for aluminum was

21.9 percent of its WRW AL. Iron had a maximum result of 2.6 percent of its associated WRW AL. Lastly, the maximum result for zinc was less than 1 percent of its WRW AL. This review indicates project decisions were not impacted by MSD RPD values for metals that were greater than 35 percent.

Table 11 Sample MSD Evaluation Summary

Test Method	CAS No.	Analyte	Max RPD (%)
SW-846 6010	7429-90-5	Aluminum ,	47.80
SW-846 6010	7440-36-0	Antimony	23.16
SW-846 6010	7440-38-2	Arsenic	1.13
SW-846 6010	7440-39-3	Barium	6.12
SW-846 6010	7440-41-7	Beryllium	·4.78
SW-846 6010	7440-43-9	Cadmium	1.18
SW-846 6010	7440-47-3	Chromium	21.51
SW-846 6010	7440-48-4	Cobalt	1.13
SW-846 6010	7440-50-8	Copper	21.05
SW-846 6010	7439-89-6	Iron	83.33
SW-846 6010	7439-92-1	Lead	29.19
SW-846 6010	7439-93-2	Lithium	3.92
SW-846 6010	7439-96-5	Manganese	47.52
SW-846 6010	7439-97-6	Mercury	146.75
SW-846 6010	7439-98-7	Molybdenum	1.16
SW-846 6010	7440-02-0	Nickel	8.89
SW-846 6010	7782-49-2	Selenium	1.14 .
SW-846 6010	7440-22-4	Silver	2.13
SW-846 6010	7440-24-6	Strontium	`_ 13.47
SW-846 6010	7440-31-5	Tin	1.16
SW-846 6010	11-09-6	Uranium, Total	1.14
SW-846 6010	7440-62-2	Vanadium	12.70
SW-846 6010	7440-66-6	Zinc	45.98

#### Field Duplicate Evaluation

Field duplicate results reflect sampling precision, or overall repeatability of the sampling process. The frequency of field duplicate collection should exceed 1 field duplicate per 20 real samples, or 5 percent. Table 12 indicates that sampling frequencies were adequate.

Table 12
Field Duplicate Sample Frequency Summary

Test Method Sample Code Number of % Duplicate Samples
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Test Method	Sample Code	Number of Samples	% Düplicate Samples
Alpha Spactroscopy	' REAL	. 8	50.00
Alpha Spectroscopy	DUP	4	30.00
Commo Spectroscopy	REAL	32	12.50
Gamma Spectroscopy	DUP	4	12.30
SW-846 6010	REAL	32	12.50
2 AA -040 OOTO	DUP	4	12.30

Duplicate sample RPDs indicate how much variation exists in the field duplicate analyses; duplicate sample RPDs are provided in Table 13. The EPA data validation guidelines state that "there are no required review criteria for field duplicate analyses, comparability" (EPA 1994b). For the DQA, the highest maximum RPDs (greater than 35 percent) are normally reviewed.

Table 13
RPD Evaluation Summary

Laboratory	Test Method	Analyte	Max RPD (%)
ESTLDEN	SW-846 6010	Aluminum	107.69
ESTLDEN	SW-846 6010	Arsenic	33.01
ESTLDEN	SW-846 6010	Barium	105.56
ESTLDEN	SW-846 6010	Beryllium	117.65
ESTLDEN	SW-846 6010	Chromium	80.85
ESTLDEN	SW-846 6010	Cobalt	150.36
ESTLDEN	SW-846 6010	Copper	89.16
ESTLDEN	SW-846 6010	Iron	113.73
ESTLDEN	SW-846 6010	Lead	110.50
ESTLDEN	SW-846 6010	Lithium	98.51
ESTLDEN	SW-846 6010	Manganese	121.17
ESTLDEN	SW-846 6010	Mercury	23.53
ESTLDEN	SW-846 6010	Nickel	120.47
ESTLDEN	SW-846 6010	Strontium	78.26
ESTLDEN	SW-846 6010	Vanadium	124.79
ESTLDEN	SW-846 6010	Zinc	102.44

All metal analytes in Table 13, except for arsenic and mercury, in Table 13 have maximum RPD values greater than 35 percent. However, project decisions were not impacted because of the following:

 Beryllium, chromium, copper, lead, lithium, nickel, vanadium, and zinc all have maximum values that are less than 10 percent of their WRW ALs. The high RPD results for these metals did not impact project decisions.

- Barium, cobalt, iron, and strontium were not detected above their associated background means plus two standard deviations.
- Although the maximum detected amount of aluminum is approximately 22 percent of its associated WRW AL, the maximum concentration of 50,000 mg/kg is well below the WRW AL of 228,000 mg/kg.

## 9.2.3 Completeness

Based on original program DQOs, a minimum of 25 percent of ER Program analytical results must be formally validated. Of that percentage, no more than 10 percent of the results may be rejected, which ensures that analytical laboratory practices are consistent with quality requirements. Table 14 presents the number and percentage of validated records (codes without "1"), verified records (codes with "1"), and rejected records for each analyte group. The summary of verified and validated records indicates the data are acceptable. The data package for this project was not submitted as a full data package due to the limited size of the project. Therefore, no validation was conducted. Although no records were validated for this project, other samples collected during the same period for IHSS Groups 300-2 and 700-6 were validated with no records being rejected. Overall program V&V completeness is based on program, not project statistics, and is adequate.

Table 14 V&V Summary

Validation Qualifier Code	Total of CAS	Alpha Spec	Gamma Spectroscopy	SW-846 6010
J1 .	148	0	0	148
UJ1	21 /	0	0	21
V1	703	40	96	567
Total	872	40	96	736
Verified	872	40	96	736
% Verified	100.00%	100.00%	100.00%	100.00%

Validations: J = Estimated, JB = Estimated with possible laboratory contamination, R = Rejected, UJ = Estimated detection limit, V = Validated,

Verifications: J1 = Estimated, JB1 = Estimated with possible laboratory contamination, R1 = Rejected, UJ1 = Estimated detection limit, V1 = Verified

#### 9.2.4 Sensitivity

RLs, in units of micrograms per kilogram (µg/kg) for organics, mg/kg for metals, and picocuries per gram (pCi/g) for radionuclides, were compared with the RFCA WRW ALs. Adequate sensitivities of analytical methods were attained for all COCs that affect project decisions. "Adequate" sensitivity is defined as an RL that is less than an analyte's associated AL, typically less than one-half the AL.

### 9.3 Summary of Data Quality

RPDs greater than 35 percent indicate the sampling precision limits of some analytes have been exceeded. No records were rejected. All records were verified. Although no records were validated for this project, other samples collected during the same period for surrounding IHSS Groups were validated with no records being rejected. If additional V&V information is received, IHSS Group 100-1 records will be updated in SWD. Data qualified as a result of additional data will be assessed as part of the CRA process. Data collected and used for IHSS Group 100-1 are adequate for decision making based on ER Program goals.

#### 10.0 PROJECT CONCLUSIONS

Arsenic was detected at one sampling location (BT39-007 at 2.5 to 4.5 ft bgs) at a concentration of 25 mg/kg, which is only slightly greater than the WRW'AL of 22.2 mg/kg. Migration of this contaminant to surface water through erosion is unlikely because the area is not prone to landslides or erosion. Migration of the arsenic in groundwater will not likely impact surface water because of the low levels of soil contamination found in IHSS Group 100-1. All other COC concentrations were well below the associated WRW ALs.

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#### **ENCLOSURE**

Complete Data Set Compact Disc - Accelerated Action Data



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Activity Level Doc. No. Doc Date Est Pages Routine Status Print  A P A 002466 P 12/01/2004 E 31 YES, ROUTINE PRELIM P.	\$\$\$ \$\$\$\$ \$\$\$\$ \$\$\$
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Data Summary Report for tHSS Group 100-1 UBC 122 (Medical Facility) and tHSS	
000-121 Tank T-1 (OPWL). This DSR summarizes accelerated action characterization activities conducted at the IHSS Group. Approval of this report	
constitutes regulatory agency concurrence that IHSS Group 100-1 is a No Further	<b>%</b> [-
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See approval under AR IA-A-002472. 1 CD attached to document.	